



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Jacob K. Javitz Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

December 9, 2024

BY ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Farhad Shakeri, et al., 24 Cr. 670 (LJL)

Dear Judge Liman:

On November 7, 2024, defendants Carlisle Rivera and Jonathan Loadholt were arrested based on the charges set forth in criminal complaint 24 Mag. 3887, which charged both with murder-for-hire and conspiracy to commit the same, in violation of 18 U.S.C. §§ 1958 and 2; and money laundering conspiracy, in violation of 18 U.S.C. § 1956.¹ That day, Rivera and Loadholt were presented before Magistrate Judge Jennifer E. Willis and ordered detained. On December 8, 2024, a Grand Jury sitting in this District returned Indictment 24 Cr. 670 (LJL), charging Rivera and Loadholt, as well as Shakeri, with the same charges as those alleged in the Complaint.

An arraignment and initial pretrial conference in this matter is scheduled for December 12, 2024 at 4:00 p.m. Accordingly, the Government respectfully requests the exclusion of time under the Speedy Trial Act from the date of this letter through December 12, 2024. The Government respectfully submits that the ends of justice served by the exclusion outweigh the best interest of the public and the defendants in a speedy trial because it will permit time for the production and review of discovery and discussions about the case between the Government and defense counsel. *See* 18 U.S.C. § 3161(h)(7)(A). Counsel for defendants Rivera and Loadholt do not object to this request.

¹ Rivera and Loadholt were charged with the same offenses in a criminal complaint filed November 8, 2024, which also charged defendant Farhad Shakeri. (*See* Dkt. 1 (the “Complaint”)).

Respectfully submitted,

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By: _____ /s/
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cc: Defense Counsel (by ECF)